

Message

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**From:** Connolly, Scott [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=73851A5AC82A40A2BC62FA4B13F8F950-SCONNOLL]  
**Sent:** 6/22/2020 9:43:18 PM  
**To:** Sehgal, Ben@ARB [ben.sehgal@arb.ca.gov]  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

Do you have time for a call about this tomorrow or later this week? There are a variety of options, that I'm working on.

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**From:** Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>  
**Sent:** Monday, June 22, 2020 1:40 PM  
**To:** Connolly, Scott <Connolly.Scott@epa.gov>; Matthew Shaffer <Matthew.Shaffer@dtsc.ca.gov>  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

**Ex. 7(A)**

With sincere regards.

Ben Sehgal  
District Support Section  
California Air Resources Board  
916.229.0638



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**From:** Connolly, Scott <Connolly.Scott@epa.gov>  
**Sent:** Monday, June 22, 2020 1:30 PM  
**To:** Sehgal, Ben@ARB <ben.sehgal@arb.ca.gov>; Shaffer, Matthew@DTSC <Matthew.Shaffer@dtsc.ca.gov>  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

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Hi Ben,

**Ex. 7(A)**

If is down right now, but if you set up a time a can give you a call on my cell.

Best,

Scott

**Scott Connolly**, Environmental Engineer  
Enforcement and Compliance Assurance Division – Air Section  
US Environmental Protection Agency, Region 9  
[connolly.scott@epa.gov](mailto:connolly.scott@epa.gov) | (415) 947-4141  
75 Hawthorne St. (ENF-2-1), San Francisco, CA 94105



United States Environmental Protection Agency

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**From:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>  
**Sent:** Monday, June 22, 2020 10:03 AM  
**To:** Matthew Shaffer <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>; Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

Here is my analysis:

**Ex. 7(A)**

# Ex. 7(A)

With sincere regards.

Ben Sehgal  
District Support Section  
California Air Resources Board  
916.229.0638



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**From:** Shaffer, Matthew@DTSC <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>  
**Sent:** Monday, June 22, 2020 9:53 AM  
**To:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>; Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

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# Ex. 7(A)

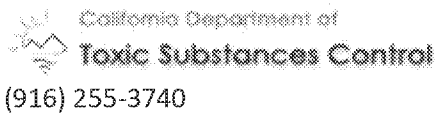
# Ex. 7(A)

Also, North State seems to be higher, 0.3955 lb VOC per ton.

<https://www.pca.state.mn.us/air/northern-metals-shredder-building-test-results>

<https://www.pca.state.mn.us/sites/default/files/TSD%20-%2014100076-101%20-%202018.pdf>

Thanks,  
Matthew



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**From:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>  
**Sent:** Friday, June 19, 2020 2:05 PM  
**To:** Shaffer, Matthew@DTSC <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>; Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

Thanks Matt.

Scott/Matt: based on 200 tons/hr production limit for SIMS, what is your estimate for SIMS annual VOC emission?  
Best guess in tons/year.

Would they be over or below the BAAQMD 100 tons VOC/yr Title V threshold?  
Estimate perhaps.

With sincere regards.

Ben Sehgal  
District Support Section  
California Air Resources Board  
916.229.0638



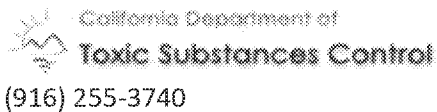
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**From:** Shaffer, Matthew@DTSC <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>  
**Sent:** Friday, June 19, 2020 1:56 PM  
**To:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>; Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

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Here is the air sampling data from a fire.

Thanks,  
Matthew

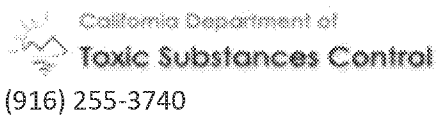


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**From:** Shaffer, Matthew@DTSC  
**Sent:** Friday, June 19, 2020 1:53 PM  
**To:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>; Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

Ben and Scott - Here is the 2014 Emissions Minimization Plan that the industry has fervently argued that it is a plan, not a permit. I also included the board meeting notes where a sims fire was discussed and that air samples were collected. I requested the sampling data and received the data a few months later. I'll send that in a following email.

Thanks,  
Matthew



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**From:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>  
**Sent:** Friday, June 19, 2020 10:16 AM  
**To:** Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>; Shaffer, Matthew@DTSC <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>  
**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

Thanks Scott.

Could you please send me the recent Sims Redwood City PTO and all annual renewals since 2010 (except 2014 and 2016)?  
I figure they would all be weak.

With sincere regards.

Ben Sehgal  
District Support Section  
California Air Resources Board  
916.229.0638



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**From:** Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>

**Sent:** Friday, June 19, 2020 10:11 AM

**To:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>; Shaffer, Matthew@DTSC <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>

**Subject:** RE: SIMS Metal conversations with EPA Region IX enforcement

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Hi Ben,

I do have the most recent Sims Redwood City PTO and all annual renewals since 2010 (except 2014 and 2016, not sure why those are missing). Do you just want the newest one? None of them are particularly comprehensive.

I also have the 2011 source test, this is the most recent test I'm aware of. During my inspection last year, it was stated that this is the last test conducted.

Let me know if you have any questions.

Best,

Scott

**Scott Connolly**, Environmental Engineer  
Enforcement and Compliance Assurance Division – Air Section  
US Environmental Protection Agency, Region 9  
[connolly.scott@epa.gov](mailto:connolly.scott@epa.gov) | (415) 947-4141  
75 Hawthorne St. (ENF-2-1), San Francisco, CA 94105



United States Environmental Protection Agency

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**From:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>

**Sent:** Friday, June 19, 2020 7:28 AM

**To:** Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>; Matthew Shaffer <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>

**Subject:** SIMS Metal conversations with EPA Region IX enforcement

Good morning Scott and Matthew.

Do either of you have the SIMS Redwood City permit (issued by BAAQMD) and past source test?

Would you be willing to share these documents? Thanks.

With sincere regards.

Ben Sehgal  
District Support Section  
California Air Resources Board  
916.229.0638



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**From:** Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Sent:** Wednesday, December 11, 2019 3:04 PM  
**To:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>; Shaffer, Matthew@DTSC <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>  
**Subject:** RE: Schnitzer and SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Ben and Matthew,

Here is the 114 Information Request that was sent to Sims back in October. I requests a number of records and site specific emissions testing on the shredder.

Let me know if you have any questions.

Scott

**Scott Connolly**, Environmental Engineer  
Enforcement and Compliance Assurance Division – Air Section  
US Environmental Protection Agency, Region 9  
[connolly.scott@epa.gov](mailto:connolly.scott@epa.gov) | (415) 947-4141  
75 Hawthorne St. (ENF-2-1), San Francisco, CA 94105



United States Environmental Protection Agency

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**From:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>  
**Sent:** Wednesday, December 11, 2019 2:16 PM  
**To:** Matthew Shaffer <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>  
**Cc:** Connolly, Scott <[Connolly.Scott@epa.gov](mailto:Connolly.Scott@epa.gov)>  
**Subject:** RE: Schnitzer and SIMS Metal conversations with EPA Region IX enforcement

Scott: can you share a copy of the 114 letter with me and Matthew?  
Thanks.

I am working with Matthew, DTSC on the Schnitzer case.  
This is in official capacity.  
Matthew is very interested in SIMS.

Matthew, Scott comes with a bunch of metal shredding experience from Chicago region EPA.



With sincere regards.

Ben Sehgal  
District Support Section  
California Air Resources Board  
916.229.0638




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**From:** Shaffer, Matthew@DTSC <[Matthew.Shaffer@dtsc.ca.gov](mailto:Matthew.Shaffer@dtsc.ca.gov)>  
**Sent:** Wednesday, December 11, 2019 1:22 PM  
**To:** Sehgal, Ben@ARB <[ben.sehgal@arb.ca.gov](mailto:ben.sehgal@arb.ca.gov)>  
**Subject:** RE: Schnitzer and SIMS Metal conversations with EPA Region IX enforcement

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ben – can I get a copy of Section 114 letter?

Thanks,  
Matthew

 California Department of  
**Toxic Substances Control**  
(916) 255-3740